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July 3, 2023

By ECF

Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Re: Bamonte, as Administrator, et al., v. Charatan, as Executor, No. 7:22-cv-795-KMK

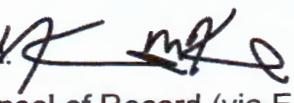
Dear Judge Karas:

We are incoming counsel to Defendant in the captioned matter, and have concurrently filed a Stipulation and Order of Substitution of Counsel, which is awaiting this Court's endorsement.

We write pursuant to Your Honor's Individual Rules of Practice I(C), to respectfully request a 45-day stay of proceedings in this matter. This request is made to afford us the opportunity to review the case files and the docket, and to otherwise familiarize ourselves with this complex matter. We note that there are significant upcoming deadlines, including a deadline to produce responses (including documents) to discovery demands on July 5, 2023. Having just been retained today, we have not even received the voluminous case files from outgoing counsel, let alone review them. As such, there is no conceivable way that we will be in a position to comply with upcoming deadlines, while concurrently getting up to speed on 17 months of litigation.

We thank the Court for its consideration.

Denied. This case has been put on a strict schedule for good reason. That Defendant elected to change counsel does not provide a license to alter the schedule.

So Ordered.  7/5/23

cc: All Counsel of Record (via ECF)

Respectfully submitted,

Larry Hutcher
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